

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GARY KOOPMANN, TIMOTHY KIDD and
VICTOR PIRNIK, Individually and on Behalf
of All Others Similarly Situated,

Plaintiffs,

v.

FIAT CHRYSLER AUTOMOBILES N.V.,
FCA US LLC, RONALD ISELI AND
ALESSANDRO BALDI, AS CO-
EXECUTORS FOR THE ESTATE OF
SERGIO MARCHIONNE, SCOTT
KUNSELMAN, MICHAEL DAHL, STEVE
MAZURE, and ROBERT E. LEE,

Defendants.

No. 15 Civ. 7199 (JMF)

**DECLARATION OF TASHA N. THOMPSON IN SUPPORT OF DEFENDANTS’
OPPOSITION TO PLAINTIFFS’ MOTION TO EXCLUDE CERTAIN
TESTIMONY OF DEFENDANTS’ PROPOSED EXPERT GEORGE H. PERSON**

I, Tasha N. Thompson, pursuant to 28 U.S.C. § 1746, hereby declare
as follows:

1. I am a member of the bar of this Court and am associated with the law firm of Sullivan & Cromwell LLP, counsel for Defendants in the above-captioned action.
2. I respectfully submit this Declaration to provide the Court with certain materials cited in Defendants’ January 18, 2019 Memorandum in Opposition to Plaintiffs’ Motion to Exclude Certain Testimony of Defendants’ Proposed Expert George H. Person.
3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the Expert Report of George H. Person, P.E. (Ret.), dated September 26, 2018.
4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the Expert Report of Robert F. Hellmuth, dated August 15, 2018.
5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript of the October 11, 2018 deposition of George Person.

6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the transcript of the September 18, 2018 deposition of Robert Hellmuth.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of January 2019, in New York, New York.

/s/ Tasha N. Thompson
Tasha N. Thompson